Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of 2 the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington. 3 4 Deputy 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 NO. CR23-5167 BHS 10 UNITED STATES OF AMERICA, 11 Plaintiff, INDICTMENT 12 V. 13 JEREMY CRAHAN, 14 15 Defendant. 16 The Grand Jury charges that: 17 COUNT 1 18 (Conspiracy to Destroy Energy Facilities) 19 On or about December 25, 2022, at Pierce County, within the Western District of 20 Washington, JEREMY CRAHAN and Matthew Greenwood did knowingly and willfully 21 conspire to damage the property of an energy facility in any amount, and to cause a 22 significant interruption and impairment of a function of an energy facility, namely, the 23 energy facilities known as the Hemlock Substation, the Elk Plain Substation, the Graham 24 Substation, and the Kapowsin Substation. All in violation of Title 18, United States Code, Section 1366(a). 25 26 27

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COUNT 2

(Destruction of an Energy Facility)

On or about December 25, 2022, at Pierce County, within the Western District of Washington, JEREMY CRAHAN and Matthew Greenwood did knowingly damage, and attempt to damage, the property of an energy facility in any amount, and did cause, and attempt to cause, a significant interruption and impairment of a function of an energy facility, namely, the energy facility known as the Hemlock Substation.

All in violation of Title 18, United States Code, Section 1366(a).

COUNT 3

(Destruction of an Energy Facility)

On or about December 25, 2022, at Pierce County, within the Western District of Washington, JEREMY CRAHAN and Matthew Greenwood did knowingly damage, and attempt to damage, the property of an energy facility in any amount, and did cause, and attempt to cause, a significant interruption and impairment of a function of an energy facility, namely, the energy facility known as the Elk Plain Substation.

All in violation of Title 18, United States Code, Section 1366(a).

COUNT 4

(Destruction of an Energy Facility)

On or about December 25, 2022, at Pierce County, within the Western District of Washington, JEREMY CRAHAN and Matthew Greenwood did knowingly damage, and attempt to damage, the property of an energy facility in any amount, and did cause, and attempt to cause, a significant interruption and impairment of a function of an energy facility, namely, the energy facility known as the Graham Substation.

All in violation of Title 18, United States Code, Section 1366(a).

Indictment - 2
United States v. Crahan
USAO No. 2022R01407

UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

COUNT 5 1 (Destruction of an Energy Facility) 2 On or about December 25, 2022, at Pierce County, within the Western District of 3 Washington, JEREMY CRAHAN and Matthew Greenwood did knowingly damage, and 4 attempt to damage, the property of an energy facility in any amount, and did cause, and 5 attempt to cause, a significant interruption and impairment of a function of an energy 6 facility, namely, the energy facility known as the Kapowsin Substation. 7 All in violation of Title 18, United States Code, Section 1366(a). 8 A TRUE BILL: 9 DATED: 10 Signature of Foreperson redacted pursuant 11 to the policy of the Judicial Conference of the United States. 12 **FOREPERSON** 13 14 15 16 MCHOLAS W. BROWN United States Attorney 17 18 19 ON TODD GREENBERG 20 Assistant United States Attorney 21 22 23 24 25 26 27